

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

2007 FEB 23 P 1:26

ROBIN JAFFE,

Plaintiff,

v.

VINCENT OLIVIERI

Defendant.

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CLERK OF COURT
MIDDLE DISTRICT ALA

CASE NO.: 3:07-CV-161-MEF

ANSWER

Comes now the Defendant, Vincent Olivieri, by and through the undersigned counsel, and in answer to Plaintiff's Complaint, responds to each numbered paragraph of Plaintiff's Complaint as follows:

1. Defendant lacks sufficient information to answer the allegations contained in Paragraph 1 of Plaintiff's Complaint. Therefore, the same is denied.
2. Defendant admits the allegations in Paragraph 2 of Plaintiff's Complaint.
3. Defendant lacks sufficient information to answer the allegations contained in Paragraph 3 of Plaintiff's Complaint. Therefore, the same is denied.
4. Defendant denies the allegations in Paragraph 4 of Plaintiff's Complaint, and demands strict proof thereof.
5. Defendant denies the allegations in Paragraph 5 of Plaintiff's Complaint and demands strict proof thereof.

AFFIRMATIVE DEFENSES

Comes now the Defendant, Vincent Olivieri, and to each count and paragraph of the

Plaintiff's Complaint, separately and severally sets down and assigns the following separate and several defenses:

First Defense

Defendant pleads the general issue and says that he is not guilty of the matters with which he is charged in the Plaintiff's Complaint and demands strict proof thereof.

Second Defense

Plaintiff's Complaint fails to allege facts against Defendant that constitute a cause of action under Alabama law and it is therefore due to be dismissed.

Third Defense

Defendant denies that Plaintiff was injured and contest any damages claimed.

Fourth Defense

Defendant pleads the statute of limitations.

Fifth Defense

Defendant denies that Plaintiff is legally entitled to recover damages from him.

Sixth Defense

Defendant avers that there is no cause, connection, or relationship between any of his actions and the Plaintiff's claimed injuries or damages.

Seventh Defense

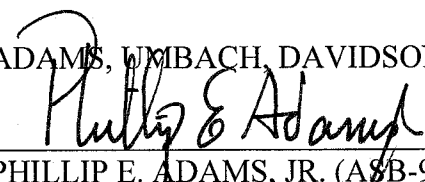
Defendant pleads the defense of laches.

Eighth Defense

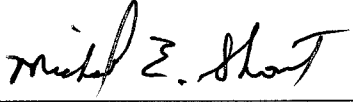
Defendant pleads the defense of unclean hands.

Dated this the 23rd day of February, 2007.

ADAMS, UMBACH, DAVIDSON & WHITE, LLP



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One of the Attorneys for Vincent Olivieri



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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon:

David Dawson, Esq.
600 Avenue A
Opelika, Alabama 36801

by placing a copy of the same in the United States mail, properly addressed and postage prepaid this
the 21 day of February, 2007.



OF COUNSEL